

MEMO ENDORSED

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By ECF

Hon. Kenneth M. Karas
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

**Re: United States v. Michael Clemons
11 Cr 630 (KMK)**

Dear Judge Karas:

I write in reply to the Government's letter (Dkt. No. 1461) dated today opposing the temporary bail modification request.

If granted, the bail modification will impose no additional burden on probation.

If granted, it will not reward Mr. Clemons for his "documented failure to abide by the conditions of supervised release."

Without litigating in this letter the underlying allegations set forth in the VOSR, the requested modification is reasonable and extremely short-lived.

Mr. Clemons has been totally compliant with his supervision obligations for the past two months in which he has been permitted to work in the community. There is no reason to believe that he presents a danger to the community or a risk of flight if this application is granted.

Thank you for your consideration in this matter.

Application is denied. Mr. Clemons' record of compliance is substandard, to put it charitably. There is no reason for Probation and the public to bear the risk of Mr. Clemons repeating his many prior violations.

Respectfully submitted,

/s/

Daniel S. Parker
Parker and Carmody, LLP

So Ordered.



8/25/20

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Cc: AUSA L. Keenan (by email)